

DOUGLAS F. CUSHNETT

DATE: 2/20/18

TIME: 11:25 a

BY: [Signature]

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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

EMERENCIANA PETER-PALICAN

Plaintiff,

v.

**GOVERNMENT OF THE
COMMONWEALTH OF THE
NORTHERN MARIANA ISLANDS,
and, TIMOTHY P. VILLAGOMEZ
in his official and individual capacities,**

Defendants.

CIV. ACTION NO. 07-0022

**DEFENDANTS' FIRST SET
OF INTERROGATORIES and
REQUEST FOR PRODUCTION
OF DOCUMENTS TO PLAINTIFF**

TO: PLAINTIFF THROUGH HER ATTORNEY OF RECORD:

DEFENDANTS, pursuant to the applicable Rules of Federal Procedure, requests that Plaintiff answer the following Interrogatories and produce the documents requested as follows:

INSTRUCTIONS

Answers may be provided in the spaces after each interrogatory. Separate pages may be attached if the spaces are inadequate.

In answering the Interrogatories, Plaintiff is required not only to furnish all information that is in her possession, but also all information that is in the possession of her attorneys, investigators, on anyone else acting on her behalf.

At the time of trial, defendants will move the court for an order excluding from evidence all tangible or intangible things known to plaintiff at the time of her response to these Interrogatories and Request for Production of Documents not disclosed in her response.

Please take notice that one copy of the answers to Interrogatories, under oath, and of any documents produced, must be served to defendants no later than thirty days, or such shorter period as

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2 2. Did any other government official or employee at any time make any representations to you
3 concerning the tenure of one appointed to the position of CNMI Special Assistant for Women's Affairs,
4 except for statements made to you after the Fitial administration took office?
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16 3. If your answer to Interrogatory No. 2 is "yes," then:

17 a) the content of the statement(s);

18 b) made by whom; and

19 c) the approximate date.
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